



# Takeda Privacy Notice

*Last updated: February 2021*

Takeda recognizes and respects the privacy rights of individuals with regard to their personal data. This Privacy Notice ("Notice") explains what type of personal data we may collect about you and how we use it.

Your privacy is important to us. If you have any questions concerning Takeda's privacy practices or wish to exercise your rights relating to personal data that Takeda has collected about you, please contact us as described in the "How to Contact Us" section below.

## Applicability and Organizations Covered by This Privacy Notice

Takeda is a group of companies with operations globally. The Takeda enterprise ("Takeda", "we", "us", "our") includes the parent company Takeda Pharmaceutical Company Limited, and its affiliated entities. For contact information related to your local affiliate, please refer to Takeda's website at <https://www.takeda.com/who-we-are/company-information/worldwide-offices/>.

This Notice applies to Takeda websites, as well as other Takeda services and activities that display or reference this Notice (together "Services").

Any person accessing, browsing or otherwise using the Services, either manually or via an automated device or program, shall be considered a "User."

## Personal Data We Collect and Use

Takeda collects personal data to operate effectively and provide you with the best experiences from our Services.

Takeda may collect information directly from you through your interactions with us when you sign up for a Service, enter into a contract with us, submit an application to us, and through various other engagements we may have with you. We may use technologies that automatically collect information when you visit our sites, view our advertisements, or use our products or services.

We also may collect information about you from third parties, such as our vendors, suppliers, contractors, and business partners. For example, we may use such third-party data to confirm contact or financial information, to verify qualifications of healthcare professionals and to check references.

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The type of personal data we collect depends on the interactions you have with Takeda and the Takeda Services you use. The specific type of personal data we process about you will be outlined in the specific privacy notice that you receive from us. If you are simply browsing one of Takeda websites, we would only process limited types of personal data such as:

- **Name and contact data:** We may collect your name, postal address, email address, telephone number and other similar contact data if you voluntarily provide this to us.
- **Usage data:** We may collect data about how you and your device interact with our Services, such as Internet protocol (IP) address used to connect your computer to the Internet, your login

information, browser type and version, time zone setting, browser-plug-in types and versions, operating system and platform; Information about your visit and online activities (e.g. page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.)

- **Relationship and interaction data:** We may collect data about our interactions and meetings, such as when you contact us for information and support.
- **Location data:** We may collect imprecise data such as a location derived from your IP address or data that indicates where you are located with less precision, such as at a city or postcode level.
- **Legally Required Information:** We may collect additional data about you that is related to patient safety and adverse events, or that may be required by laws that apply to Takeda.

In some cases, and only for certain types of services, we may enhance the information we hold about individuals with information we receive from third parties and with information which is publicly or commercially available and/or which is obtained by any other legal means.

For example, we may collect publicly available information, including online postings, social media platforms, publication databases, journals, and societies. Please note that any information you post or disclose through these services may become publicly available information to users of the service you provided it to, and to the general public. We urge you to be very careful when deciding to disclose your personal data, or any other information, in these forums, and to carefully review and familiarize yourself with applicable privacy settings and options.

## How We Use Personal Data

Depending on your relationship with Takeda, Takeda uses the personal data we collect for a number of basic purposes, described in more detail below: (1) for business operations (marketing and sales, research and development, patient support, donations and sponsorships, communications), (2) for business administration (finance and accounting, human resources, prevention and investigatory activities), (3) for business management (internal audit, asset management, system and business controls), and (4) as necessary to protect the health, safety, and security of Takeda personnel and to comply with legal requirements and obligations. Takeda does not sell your personal data.

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We may use personal data:

- To communicate with you regarding any requests or inquiries you may submit and to provide you with related support or Service.
- To contact you from time to time to provide you with important information, required notices, and promotional materials.
- To send administrative information to you, for example, information regarding the (changes to) Services we provide.
- To personalize your experience when using our Services by presenting products and offers tailored to you when relevant and appropriate.
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns, conducting surveys, and operating and expanding our business activities.
- To better understand how our products and Services impact you, to track and respond to safety concerns and to further develop and improve our products and Services.

- As we believe necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public or government authorities, including authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; (g) to allow us to pursue available remedies or limit the damages that we may incur.

## Legal Basis for Processing Personal Data

When Takeda engages in the processing of your personal data, we will only do so if this is allowed, also referred to as *having a legal basis to process your personal data*. The legal bases Takeda would rely on include:

- when we have a contract or agreement with you – for example, a contract to supply goods or services (i.e. when you engage with us to visit a Takeda organized event, or order information on-line), or an employee contract;
- when we must comply with a legal obligation – for example, when processing your data is a legal requirement, for example in some countries there are transparency requirements regarding interaction with healthcare professionals, or to provide information to authorities in case of adverse events related to use of our products;
- when data processing is in your vital interests – for example, when this might protect your life;
- when processing your data for our legitimate interests as a pharmaceutical company in compliance with our corporate policies – for example, to communicate with you about our products and services, about scientific research and educational opportunities, scientific and market research surveys, as well as for the effective continuation of our business operations.

In all situations where there is no other legal basis, Takeda will ask for your agreement (known as “consent”) as legal basis to process your personal data.

Note that if you provide your consent, you may also at any time withdraw your consent by contacting us as described in the “How to Contact Us” section. It is also important to know that you have other rights regarding the processing of your personal data, see the section on “Your rights related to your personal data”.

## Who We Share Personal Data With

We share data with Takeda-controlled affiliates and subsidiaries; with vendors working on our behalf; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of our Services; and to protect the rights or property of Takeda.

In such cases, Takeda will require these third parties to protect the confidentiality and security of the personal data that is shared with them. These third parties will be required to agree that they will not use or disclose personal data about you except as necessary to provide services to us or perform services on our behalf, or as necessary to comply with applicable laws or regulations.

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Takeda may share your personal data with affiliates and third parties as follows:

- Among affiliates for the purposes described in this Notice. Takeda is the party responsible for the management of the jointly used personal data.
- To our third-party service providers that provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing and other similar services. Takeda policy requires that our service providers adhere to appropriate restrictions on access and use of your personal data.
- To third parties to allow them to send marketing communications.
- To third-party sponsors of sweepstakes, contests and similar promotions.

We may also disclose your personal data in the following circumstances:

- In the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer or sale or disposition of all or any portion of our business, including in connection with any bankruptcy or similar proceedings. As required by law, including laws outside your country of residence, to comply with a subpoena, required registration, or legal process.

We may also disclose aggregate or de-identified data that is not personally identifiable to third parties. Aggregate data is created by collecting and processing information about individuals and summarizing the data, eliminating the possibility to identify an individual.

## How Do We Protect Your Personal Data

We have implemented a variety of security technologies and organizational procedures to protect your personal data from unauthorized access, use and disclosure. For example, we store your personal data on computer systems that have various types of technical and physical access controls, such as encryption. Takeda has implemented data security controls consistent with industry standards; however, Takeda cannot guarantee the security of your information. It is also important for you to protect against unauthorized access to your password(s) and your computer, mobile devices, etc. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please notify us immediately as described in the “How to Contact Us” section below.

## Where We Store and Process Personal Data

As Takeda is a multi-national organization with locations in many countries around the world, your personal data may be stored and processed in any country in which we operate, including where we have facilities, or in which we engage service providers. Takeda takes steps to process personal data according to the provisions of this Notice and the requirements of applicable law.

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Takeda may transfer personal data to countries outside of your country of residence. The laws of the receiving countries may not provide as stringent protections for personal data as your country of residence. In instances where a lesser level of protection is provided by a receiving country, Takeda undertakes that adequate safeguards are in place and that applicable laws and regulations are complied with in connection with such transfers.

In certain cases, Takeda undertakes to enter into contractual agreements (e.g., European Union Standard Contractual Clauses), or relies on other available data transfer mechanisms that aim to

provide adequate protections. A copy of the EU Standard Contractual Clauses boilerplate contracts may be found at: <http://ec.europa.eu/justice/data-protection/international-transfers/transfer/>.

To obtain additional information regarding the safeguards that Takeda has put in place to govern cross-border transfers of personal data, please contact us using the information provided in the “How to Contact Us” section.

## Retention Period

Takeda will retain your personal data only for the minimum period necessary to fulfill the purposes outlined in this Notice unless a longer retention period is required or permitted by law.

## Your Rights Related to Your Personal Data

You have choices about the data we collect. When you are asked to share your personal data with Takeda, you may decline; however, your choice not to share your personal data with Takeda may mean you will not be able to use or (fully) benefit from our Services, features or offerings.

Takeda respects your right, or where permitted by law, your authorized agent, to know and inquire about what personal data we have collected, used or disclosed. In addition, you or your authorized agent, have the right to request correction or deletion of such personal data, as well as to request removal of your personal data held by third parties with whom we conduct business. Takeda will not discriminate against you based on your exercise of any of these rights.

For more information about your privacy rights, or if you are not able to resolve a problem directly with us and wish to make a complaint, please contact the relevant data protection authority that is responsible for making sure that privacy laws are followed in your country of residence. Individuals residing in the EEA may find a list of their local data protection authorities at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en). For further details on other jurisdictions’ data protection authorities, please contact us as described in the “How to Contact Us” section below.

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If you would like to make a request for Takeda to access, correct or delete personal data that you have provided to Takeda, please contact us as described in the “How to Contact Us” section below, and we will respond in a reasonable time. We will make a good faith effort to provide you with access to your personal data and to correct any inaccuracies or delete such information at your request if it is not otherwise required to be retained by law or under other legally permitted exceptions. If for any reason your request is declined, we will notify you. Before fulfilling your requests we may require additional information from you in order to verify your identity.

Takeda will inform you if it intends to use your data for marketing purposes and to send marketing communications to you or if it intends to disclose your information to any third party for such purposes. You have the right to opt out from marketing communications that are being sent to you by Takeda. You can exercise your right to prevent such processing by informing Takeda at any time that you do not wish to receive such marketing. Where you wish to exercise this right, please use the “unsubscribe” functionality in the relevant communications or refer to the “How to Contact Us” section below.

## Children

Takeda treats children's information with extra care to ensure that they receive additional protection and safety. We may in some instances collect personal data about children with the consent of a parent or guardian for the provision of our Services such as clinical activities or for patient support programs. However, we do not otherwise knowingly solicit data from, or market to, children.

As a parent or guardian, if you wish to remove personal data related to your child, please contact us as described in the "How to Contact Us" section below.

## Social Networks

Generally, social networks are interactive tools that enable you to collaborate and share information. Takeda may collect certain personal data from you to enable you to use online social network features. Takeda may also use these tools to post or share personal data with others. When using social networks, you should be very vigilant about what personal data you choose to share with others. Takeda provides notices and choices about how personal data is collected, used and disclosed on its website, social networks and other services. When engaging in social network activities, you should not post information about third parties without their consent.

## Third Party Services

This Notice does not address, and Takeda is not responsible for, the terms of use, information or privacy practices of any third parties, including any third party operating any site or service to which our Takeda Service links. The inclusion of a link on the Takeda Service does not imply our or our affiliates' endorsement of the linked site or service.

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Please note that we are not responsible for the collection, use and disclosure policies and practices (including the data security practices) of other, non-Takeda organizations, such as Facebook, Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer. If you choose to share or disclose your personal data to other organizations through, or in connection with our social media pages, you should refer to the privacy notices and terms of use provided by those organizations. Takeda encourages you to review and familiarize yourself with applicable privacy settings and functions of these third-party platforms and applications.

## How to Contact Us

Takeda welcomes any questions or comments you may have regarding this Notice or its implementation. You may also request this Notice in an alternative format if necessary due to a disability. Any such questions, comments or requests should be submitted using the contact information below. Please note that email communications are not always secure, so we encourage you not to include sensitive information in your emails to us.

### Contact Details:



If you would like to exercise your individual rights, please contact us by accessing our [Individual Rights](#) webform. If you have questions about this Privacy Notice, please contact us by email.

Email Address: [privacyoffice@takeda.com](mailto:privacyoffice@takeda.com)

Additionally, In the United States, you may contact Takeda at 1-800-676-8975.

## **Updates to Our Privacy Notice**

Takeda may update this Notice from time to time. If we make any changes, the updated Notice will be posted with a revised effective date.